

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERONICA KARIUKI,	:	
	:	
Plaintiff,	:	
	:	Case No. 1:15-cv-00934-TSE-JFA
v.	:	
	:	
ETEAM, INC.,	:	
	:	
Defendant.	:	

DEFENDANT ETEAM, INC.'S INITIAL DISCLOSURES

Defendant eTeam, Inc. ("eTeam"), by counsel, Carr Maloney P.C., hereby makes its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT MAY BE USED TO SUPPORT ETEAM'S DEFENSES

Veronica Kariuki
1027 C Margate Court
Sterling, VA 20164

Information includes: events alleged in the Complaint; communications with eTeam; educational history; employment history; efforts to find employment since August 5, 2013; alleged damages; alleged emotional and mental injuries.

Kumar Nagdev
Address is currently unknown

Information includes: events alleged in the Complaint.

Ben Thakur
eTeam, Inc.
1001 Durham Avenue, Suite 201
South Plainfield, NJ 07080
732-248-1900 ext. 206

Information includes: eTeam's recruiting and hiring practices.

Defendant eTeam reserves the right to supplement this response as discovery progresses.

II. CATEGORIES AND LOCATION OF DOCUMENTS

Defendant eTeam has attached all documents described in the Rule as Exhibit 1. Defendant eTeam reserves the right to supplement this response as discovery progresses.

III. COMPUTATION OF DAMAGES

Defendant eTeam does not currently claim any damages in relation to this action. Defendant eTeam reserves the right to supplement this response as discovery progresses.

IV. INSURANCE

Defendant eTeam has attached all documents described in the Rule as Exhibit 2.

ETEAM, INC.
By counsel

CARR MALONEY P.C.

/s/ Tina M. Maiolo
Tina M. Maiolo, Esquire (VSB # 40512)
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Counsel for Defendant eTeam, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing *Defendant eTeam, Inc.'s Initial Disclosures* was electronically filed this 2nd day of December, 2015 and served electronically upon:

J. Andrew Baxter
Merritt J. Green
Connie M. Ng
General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

/s/ Tina M. Maiolo
Tina M. Maiolo